

AFM:LRO
F. #2025R00358

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

JOSEPH NEUMEYER,

Defendant.

----- X

TO BE FILED UNDER SEAL

**COMPLAINT AND
AFFIDAVIT IN SUPPORT
OF ARREST WARRANT**

(18 U.S.C. § 844(f)(1))

25 MJ 195

EASTERN DISTRICT OF NEW YORK, SS:

Byron Cody, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about May 19, 2025, in Israel and elsewhere out of the jurisdiction of any particular state or district, the defendant JOSEPH NEUMEYER, who was first brought to and arrested in the Eastern District of New York as a defendant herein, did maliciously attempt to damage and destroy, by means of fire and explosives, buildings, vehicles, and other personal and real property in whole or in part owned and possessed by, and leased to, the United States and departments and agencies thereof, in violation of Title 18, United States Code, Section 844(f)(1).

(Title 18, United States Code, Sections 844(f)(1) and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

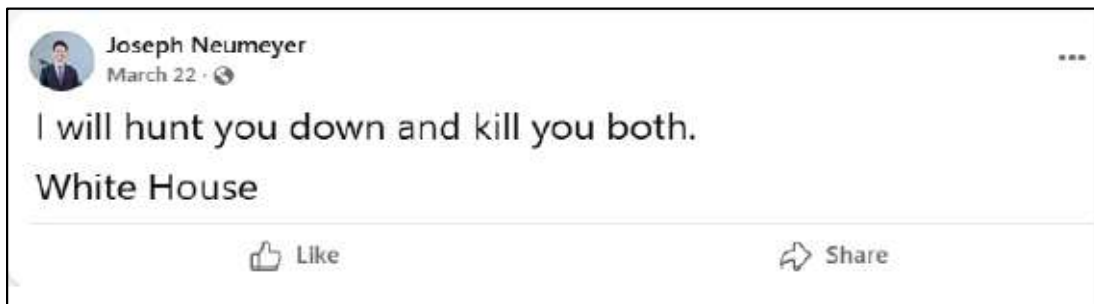
1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since 2012. I am currently assigned to the FBI’s Washington Field Office, where I am responsible for conducting domestic and international investigations involving, among other things, acts of terrorism, including bombings and other attacks on government facilities; crimes against property, including arson; and other violent crimes, such as kidnapping and murder. In connection with these investigations, I conduct and participate in physical surveillance; review electronically stored information, including social media records; debrief informants and witnesses; and execute search warrants and arrest warrants, among other things. My training and experience also include investigating international and domestic terrorism, including with FBI’s Albuquerque Field Office Joint Terrorism Task Force, the FBI’s Counterterrorism Division, and the Washington Field Office. Based on my training and experience, I have become knowledgeable about criminal activity, particularly violations of federal statutes regarding crimes that threaten the national security of the United States.

2. I am familiar with the facts and circumstances set forth below from my training, experience, and participation in the investigation; from my review of documents and other evidence; and from reports of and conversations with other law enforcement officers involved in the investigation, both domestic and foreign. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts obtained during the course of the investigation.

3. The defendant, JOSEPH NEUMEYER, is a dual United States and German citizen who was born in Colorado and who, until approximately 2025, resided in the United States.

4. Based on my review of a publicly available online profile, I believe that NEUMEYER operates a Facebook account with the name “Joseph Neumeyer” and a profile photograph of NEUMEYER. Based on my review of that account, I am aware that NEUMEYER has posted threatening statements that, among other things, called for the assassination of the President of the United States.

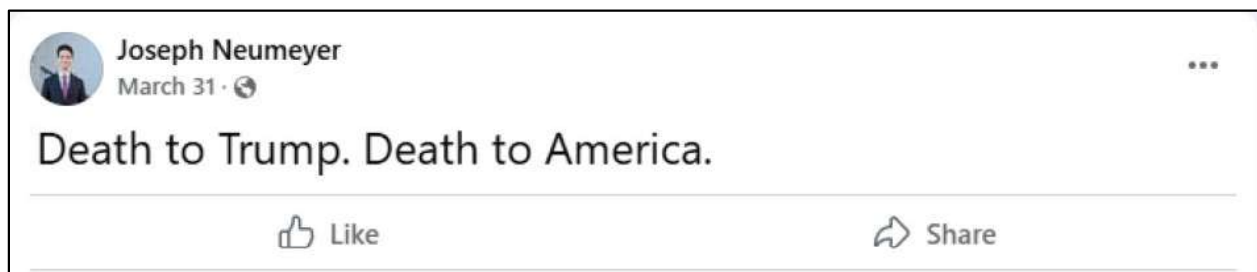
5. For example, on or about March 22, 2025, NEUMEYER posted the following on Facebook:



6. In addition, on or about March 24, 2025, NEUMEYER posted the following on Facebook:

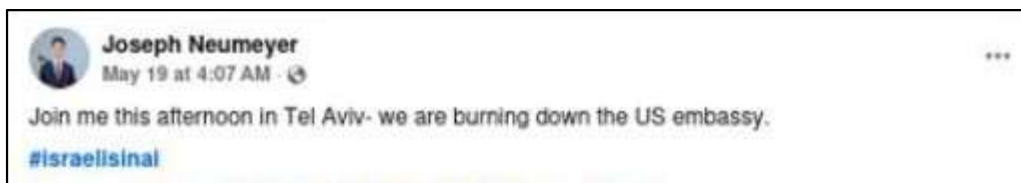


7. Similarly, on or about March 31, 2025, NEUMEYER posted the following on Facebook:



8. On or about February 7, 2025, NEUMEYER departed the United States on an Air Canada flight to Toronto. On or about April 23, 2025, NEUMEYER arrived in Israel.

9. On or about May 19, 2025, NEUMEYER posted to his Facebook account, among other things, that he planned to "burn down the embassy in Tel Aviv":





10. Later that day, at approximately 1:20 p.m. (Tel Aviv time) on May 19, 2025, an individual later identified as NEUMEYER approached the Branch Office of the Embassy of the United States located on HaYarkon Street in Tel Aviv, Israel (the “Embassy”). NEUMEYER was on foot and wearing a dark colored backpack.

11. As NEUMEYER approached the Embassy, he encountered a local guard force member (“Guard-1”) on foot patrol. As he passed Guard-1, approximately two meters from an employee entrance to the Embassy, NEUMEYER spat at Guard-1. Guard-1 attempted to stop NEUMEYER as NEUMEYER walked across the street. Guard-1 approached NEUMEYER from behind and touched him on the shoulder. NEUMEYER turned, looked at Guard-1, and stated “fuck you” in English several times. NEUMEYER then turned around and attempted to flee. At that moment, Guard-1 grabbed NEUMEYER’s backpack to prevent him from fleeing. NEUMEYER broke free and began to flee, leaving his backpack behind. A second local guard force member (“Guard-2”) pursued NEUMEYER, but NEUMEYER evaded capture and fled.

12. Upon opening the backpack, Guard-1 noticed a strong odor of “pure” alcohol emanating from the backpack and observed a bottle with black cloth protruding from its neck, which Guard-1 recognized to be an improvised incendiary device (commonly referred to as a “Molotov cocktail”).

13. Based on reports and photographs provided by foreign law enforcement officials, I am aware that NEUMEYER's backpack contained three bottles containing a clear liquid, at least one of which had a cloth protruding from the neck. Based on information later provided by the Israeli National Police, I am aware that the bottles recovered from NEUMEYER's backpack contained flammable liquid—namely, ethanol. Based on my training and experience, I believe NEUMEYER's backpack contained one or more rudimentary improvised incendiary devices, or Molotov cocktails.

14. Officers of the Israeli National Police, including members of an explosive ordinance disposal team, were called to the scene in order to render the Molotov cocktails safe, as depicted below:



15. Based on video surveillance in the vicinity of the Embassy, law enforcement tracked NEUMEYER to a nearby hotel, approximately five blocks away from the

Embassy. A hotel employee (“Employee-1”) was shown a still image of NEUMEYER taken from video surveillance in the vicinity of the Embassy. Employee-1 advised law enforcement that NEUMEYER was a guest at the hotel and identified the room number where NEUMEYER was staying. Guard-1 similarly identified the still image of NEUMEYER as the assailant whom Guard-1 had previously encountered at the Embassy.

16. Law enforcement knocked on the room number provided by Employee-1 and NEUMEYER opened the door. NEUMEYER’s appearance was consistent with a description previously provided by Guard-1.

17. Law enforcement advised NEUMEYER, among other things, of his right to remain silent and right to an attorney. NEUMEYER subsequently identified himself as the individual who assaulted a guard at the Embassy, and further stated, in sum and substance, that his backpack contained “Molotov cocktail bottles” that contained vodka. NEUMEYER was apprehended.

18. Based on information provided by foreign law enforcement, I am aware that NEUMEYER will be processed for deportation to the United States. NEUMEYER is expected to arrive at John F. Kennedy International Airport in Queens, New York on or about May 25, 2025.

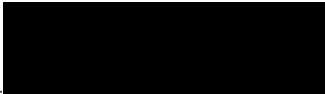
19. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrant, as disclosure would give the defendant an opportunity to change patterns of behavior and flee from or evade prosecution, and would therefore have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant JOSEPH NEUMEYER so that he may be dealt with according to law.



Byron Cody
Special Agent, Federal Bureau of Investigation

Sworn to before me this
24th day of May, 2025 by telephone



THE HONORABLE PEGGY KUO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK